UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOES 1-9,

Case No.: 7:20-cv-00947-JD

Plaintiffs,

VS.

CONSENT MOTION FOR EXTENSION OF TIME

COLLINS MURPHY, LIMESTONE COLLEGE, MG FREESITES, LTD., d/b/a PORNHUB.COM, and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM,

Defendants.

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiff may file a response to Defendant Limestone's Motion to Dismiss. (See Dkt. No. 102).

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. Upon conferring, counsel for the Defendant consents to allow Plaintiffs to extend the time to file a Response by (14) fourteen days. The current due date is February 24, 2021. The new due date would be March 10, 2021.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, the Plaintiff, respectfully requests this Court grant Plaintiff's Motion and enter an order extending the time in which he may file a Response by an additional fourteen (14) days.

HAVING SEEN AND AGREED:

BELL LEGAL GROUP, LLC

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)
Joshua M. W. Salley (#13214)
BELL LEGAL GROUP, LLC
219 North Ridge Street
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@edbelllaw.com
jsalley@edbelllaw.com
Counsel for Plaintiffs

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted *Pro Hac Vice*)
Liz J. Shepherd (admitted *Pro Hac Vice*)
Jordan A. Stanton (admitted *Pro Hac Vice*)
DOLT, THOMPSON, SHEPHERD & CONWAY, PSC
13800 Lake Point Circle
Louisville, KY 40223
Telephone: (502) 244-7772
tthompson@kytrial.com
lshepherd@kytrial.com
gistanton@kytrial.com *Counsel for Plaintiffs*

RAHIMI, HUGHES & PADGETT, LLC

/s/ John A. Hubert
JOSEPH Y. RAHIMI II
Federal ID No. 9670
JOHN A. HUBERT
Federal ID No. 13154
33 Bull Street, Suite 590
Savannah, Georgia 31401

(912) 421-9988 jrahimi@rhp-law.com jhubert@rhp-law.com

ATTORNEYS FOR DEFENDANT LIMESTONE UNIVERSITY

JENNIFER S. CLUVERIUS Federal ID No. 9992 L. GRANT CLOSE III Federal ID No. 10810

ATTORNEYS FOR DEFENDANT LIMESTONE UNIVERSITY

NEXSEN PRUET, LLC

55 East Camperdown Way, Suite 400 (29601) Post Office Drawer 10648 Greenville, South Carolina 29603-0648 Phone: (864) 370-2211 jcluverius@nexsenpruet.com gclose@nexsenpruet.com